IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF TEXAS EL PASO DIVISION

IN RE: Jorge Velasquez, Jr §

and Alma Rosa Velasquez, § CASE NO. 12-32094

§

Debtors. § Chapter 13 Proceeding

MOTION TO VACATE ORDER OF DISMISSAL AND REINSTATE CHAPTER 13 CASE

This pleading requests relief that may be adverse to your interests.

If no timely response is filed within twenty-one days from date of service, the relief requested in the motion may be granted without a hearing being held.

A timely filed response is necessary for a hearing to be held.

TO THE HONORABLE H. CHRISTOPHER MOTT, U.S. BANKRUPTCY JUDGE:

Come now, Debtors through their attorney of record, W. Matt Watson., pursuant to Rule 59, file this Motion To Vacate Order of Dismissal and Reinstate Chapter 13 Case and for cause shows the Court the following:

I.

The Debtors filed a Voluntary Petition for Relief under Chapter 13 of Title 11. United States Code, on November 2, 2012 with payments of \$210.00 per month for 60 months. The plan submitted was confirmed on January 11, 2013.

II.

On October 23, 2014 this Honorable Court entered an Order Dismissing Chapter 13 Case due to failure to cure default as stated within the Trustee's warning letter. It is document number 20 on the Courts Docket. On the same day of the dismissal Debtors sent in payment for their Chapter 13 plan. This motion is timely filed.

III.

Not reinstating the Debtors case would cause unjust harm to the Debtors and will render them incapable of successfully reorganizing.

IV.

At the time of the filing of this motion, Debtors are current on plan payments and proof of said payments are attached herein as "Exhibit A."

V.

Debtors will make sure that remaining plan payments are sent out in a timely manner and that all other Chapter 13 requirements are complied with.

WHEREFORE PREMISES CONSIDERED, Debtors pray that this Court vacate the Order Dismissing Debtors' Chapter 13 Case that was entered October 23, 2014, and reinstate the Debtors case. Debtors pray for such other and further relief as is just.

DATED this the 29th day of October, 2014.

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RESPECTFULLY SUBMITED

WATSON LAW FIRM, P.C.

BY:/s/ W. Matt Watson

W. Matt Watson SBN: 24028878 1123 E. Rio Grande El Paso, Texas 79902 PH: (915) 532-7526

FAX: (866) 201-0967

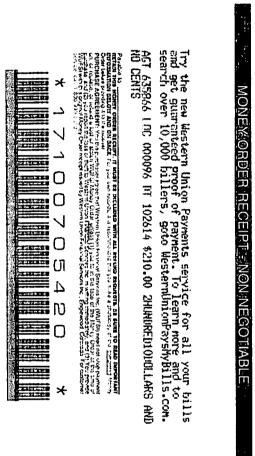
ATTORNEY FOR DEBTORS

CERTIFICATE OF SERVICE

I hereby certify that on October 29, 2014, a true and correct copy of the foregoing instrument was served electronically to the parties listed on the court's electronic matrix and by first class mail to the creditors and parties in interest pursuant to the attached matrix..

<u>/s/ W. Matt Watson</u> W. Matt Watson

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AT&T
Attn: Bankruptcy Dept.
P.O. Box 57907
Murray, UT 84157-0907

Gemb/care Credit Attn: bankruptcy PO Box 103104 Roswell, GA 30076 Stuart C. Cox, Trustee 1760 North Lee Trevino El Paso, TX 79936

Bk Of Amer

Attn: Bankruptcy/MC: NC4-105-03 PO Box 26012

Greensboro, NC 27410

Gvt Emp Cu 7227 Viscount Blvd El Paso, TX 79925 USBC

Cap One Po Box 5253

Carol Stream, IL 60197

Gvt Emp Cu Po Box 20998 El Paso, TX 79998

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Carol Stream, IL 60197

Jefferson Capital Systems PO Box 7999 Saint Cloud, MN 56302-9617

Capl/bstby Po Box 5253 Carol Stream, IL 60197 Kohls/capone N56 W 17000 Ridgewood Dr Menomonee Falls, WI 53051

Central Finl Control Po Box 66051 Anaheim, CA 92816 LTD Financial Services, L.P. 7322 Southwest Freeway, Ste. 16 Houston, TX 77074

Citibank Usa CITICORP CREDIT SERVICES/ATTN: PO Box 20363 Kansas City, MO 64195 Med Busi Bur 1460 Renaissance Dr Park Ridge, IL 60068

Credit Collection Services Two Wells Avenue, Dept. 587 Newton, MA 02459

Cnemain Fi Po Box 499 Hanover, MD 21076

Gecrb/ashley Furniture 950 Forrer Blvd Kettering, OH 45420 Paramount Recovery Attn: Bankruptcy PO Box 788 Lorina, TX 76655

Gecrb/discount Tire C/o Po Box 965036 Orlando, FL 32896 Sears Credit Cards PO Box 183081 Columbus, OH 43218-3081

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IN RE: Jorge Velasquez, Jr
and Alma Rosa Velasquez,

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CASE NO. 12-32094

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Debtors.

Chapter 13 Proceeding

ORDER ON MOTION TO VACATE ORDER AND REINSTATE CHAPTER 13 CASE

On this day, came on to be considered the Motion to Vacate Order of Dismissal and Reinstate Chapter 13 Case filed by the subject Debtors herein. The Court finds that all creditors and parties in interest were duly and properly given notice of Debtors' proposal and that, after review of the motion and any responses and evidence submitted therewith, the Court finds that the proposed Motion is in the best interest of the estate. It is therefore.

ORDERED ADJUDGED AND DECREED that the motion is hereby

GRANTED as follows:

The Order for Summary Dismissal entered on October 23, 2014, as Document Number 20 in the Court's Docket is hereby VACATED and of no further force of effect; and, the case is hereby REINSTATED in the Court's docket.

Watson Law Firm, P.C 1123 E. Rio Grande Ave. El Paso, TX 79902